



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 30, 2024

BY ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. 19 Duck Pond Lane, et al.*, 23 Civ. 1545 (JGLC)

Dear Judge Clarke:

Plaintiff United States (the “Government”) respectfully submits this letter, with the consent of the parties in the above-captioned matter, to request an adjournment *nunc pro tunc* of the September 19, 2024, fact discovery deadline set forth by the Court in its Order of June 4, 2024 (D.E. 66) (the “June Order”). The June Order extended the original fact discovery set forth by the Court in its Civil Case Management Plan and Scheduling Order of September 15, 2023 (D.E. 42).

As the Court is aware, counsel for claimants Medallion and Voxi (the “Claimants”) had been waiting for the issuance of a license from OFAC to receive payments for legal services that counsel needed to litigate this matter. On August 7, 2024, the Claimants filed a motion to dismiss the complaint for violations of due process resulting from OFAC’s failure to issue a license. (D.E. 69). The motion asked, *inter alia*, for a stay of discovery. (*Id.*). On September 9, 2024, OFAC issued a license permitting counsel for Claimants to receive payment for his legal services and reimbursement for litigation expenses. As such, the parties are now able to proceed with the remaining discovery that was delayed due to the lack of the OFAC license.

The parties propose a discovery deadline of December 16, 2024, which will provide Claimants' counsel time to review the Government's discovery and will allow the Government and Claimants time to schedule and conduct depositions of several parties.

Respectfully submitted,

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